

Office of Environmental Management – Grand Junction



Moab UMTRA Project
Records Management Manual

Revision 7

May 2019



U.S. Department
of Energy

Office of Environmental Management

Moab UMTRA Project Records Management Manual

Revision 7

Review and Approval

5/29/2019

[Redacted Signature]

5/29/2019

[Redacted Signature]

5/29/2019

[Redacted Signature]

RAC Project Manager
Signed by: [Redacted]

5/29/2019

[Redacted Signature]

Revision History

Revision	Date	Reason for Revision
0	April 2008	Initial issue.
1	June 2011	Clarified content regarding destruction and image instructions and added new forms.
2	November 2012	Periodic update and expansion to include Vital Records Program (Section 4.6.6).
3	May 2015	Periodic update includes content clarification throughout.
4	March 2017	Revision includes additional active records text in Section 5.0 and active storage text in Section 8.0.
5	October 2017	Revision includes copy changes to clarify sections of the Manual.
6	June 2018	Revision incorporates EMCBC review comments.
7	May 2019	Revision includes incorporation of electronic records content.

Contents

<i>Section</i>	<i>Page</i>
Acronyms and Abbreviations	iv
1.0 Purpose.....	1
2.0 Scope.....	1
3.0 Responsibilities.....	1
3.1 DOE, RAC, and TAC General Managers	1
3.2 TAC Support Group Manager	1
3.3 Records Manager	2
3.4 DOE, RAC, and TAC Managers, Supervisors, and Project Managers.....	2
3.5 Records Coordinators.....	2
3.6 Individual Employees	3
4.0 Record Creation, Transfer, and Processing	3
4.1 Record and Non-record Identification	3
4.1.1 Records	3
4.1.2 Non-records.....	4
4.1.3 Electronic Mail (Email)	4
4.2 Maintaining Legibility and Reproducibility	4
4.3 Quality Record Authentication	5
4.4 Record Continuity.....	5
4.5 Special Media.....	6
4.5.1 Audiovisual/Photographic Material	6
4.5.2 Electronic Records	6
4.6 Special Record Types	7
4.6.1 Archaeological Records	7
4.6.2 Epidemiologic Records	8
4.6.3 Privacy Act Records	8
4.6.4 Official Use Only Records.....	8
4.6.5 Quality Records	9
4.6.6 Essential Records Program/Plan	9
4.6.7 Contractor-owned Records	10
4.7 Records Transfer	10
4.8 Records Processing	10
5.0 Active Records Storage and Use.....	10
5.1 Records Disaster Prevention, Mitigation, and Recovery	11
6.0 File Maintenance	12
6.1 File Access and Records Retrieval	12
6.2 File Cutoff.....	13
6.3 File Plan Maintenance.....	13
7.0 Terminating Employees.....	13
8.0 Inactive Storage.....	14
9.0 Disposition Plan.....	14
10.0 Training	16
11.0 Records Created by this Manual	16
12.0 Definitions.....	16
13.0 References	19

Attachments

- Attachment 1. Records Transfer Transmittal Form 1352
Attachment 2. Records Destruction Authorization/Certificate Form 1353

Acronyms and Abbreviations

ASME	American Society of Mechanical Engineers
ARPA	Archaeological Resources Protection Act
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
DOERMS	Department of Energy Records Management System
ERMS	Electronic Records Management System
FRC	Federal Records Center
GRS	General Records Schedule
GSA	General Services Administration
MRC	Moab Record Collection
NARA	National Archives and Records Administration
NQA	Nuclear Quality Assurance
RAC	Remedial Action Contractor
RMFO	Records Management Field Officer
RTT	Records Transfer Transmittal
TAC	Technical Assistance Contractor
UMTRA	Uranium Mill Tailings Remedial Action
USC	United States Code

1.0 Purpose

This Manual establishes the requirements and responsibilities for the management of the U.S. Department of Energy (DOE) Office of Environmental Management Moab Uranium Mill Tailings Remedial Action (UMTRA) Project records by the Remedial Action Contractor (RAC), Technical Assistance Contractor (TAC), and DOE.

The Moab Records Management Program objectives are achieved by developing and implementing continuous, systematic, and cost-effective controls over each phase of a record's lifecycle: creation, active use, maintenance, and disposition. The Moab UMTRA Project Essential Records Program and Disposition Plan are imbedded in this Manual.

2.0 Scope

This Manual applies to all records as defined under the Title 44 United States Code Chapter 31 (44 USC 31), the Federal Records Act of 1950, regardless of medium (including paper, microform, electronic, audiovisual, and record copies of agency publications), that are created, collected, processed, used, stored, and/or disposed of by the Moab Project DOE/contractor employees, organizations, facilities, and those individuals acting as agents.

Additional requirements are imposed on the management and disposition of records. All records shall be preserved and dispositioned in accordance with the Moab file plan, which ensures records are scheduled, maintained, and dispositioned in accordance with federal regulations and National Archives and Records Administration (NARA)-approved records disposition schedules.

3.0 Responsibilities

3.1 DOE, RAC, and TAC General Managers

The RAC Project Manager and TAC Senior Program Manager ensure the contractor Records Management Program is implemented and sustained in accordance with the requirements of applicable federal laws, DOE regulations, and the Moab Records Management Program.

3.2 TAC Support Group Manager

The TAC Support Group Manager reports directly to the TAC Senior Program Manager and is responsible for acting as the primary interface with the TAC Senior Program Manager and the Records Manager to ensure an effective, cost-efficient approach to records management according to applicable federal laws, DOE regulations, and the Moab Records Management Program.

3.3 Records Manager

The Records Manager is responsible for:

- Ensuring DOE regulations and requirements are implemented by all contractor organizations and subcontractors.
- Developing policies, procedures, and training to govern the creation, maintenance, use, and disposition of all records created under the Moab Project contract, regardless of media. At a minimum, this should include establishing:
 - File location.
 - Filing methods.
 - Designation of file custodian.
 - Process for updating the file index.
 - Access control procedures.
 - Checkout procedures.
 - Practices that minimize the possibility of damage or deterioration to the official record copy.
 - Maintenance and use of any sensitive company confidential documents maintained by the contractor in accordance with DOE orders.

3.4 DOE, RAC, and TAC Managers, Supervisors, and Project Managers

DOE, RAC, and TAC managers, supervisors, and Project managers are responsible for:

- Ensuring their staff members are appropriately informed about their responsibilities under this Manual for the creation, maintenance, use, and disposition of records.
- Ensuring records are identified, created, and maintained for their activities as defined by this Manual and in any supporting Project-specific guidance.
- Ensuring all records generated/received are forwarded to the responsible Records Coordinators or file custodian.
- Ensuring records created for each respective task are complete (administratively and technically), legible, and reproducible before distribution.
- Ensuring records created by their area of responsibility are identified in the file plans, as appropriate.

3.5 Records Coordinators

Records Coordinators are responsible for:

- Serving as resources to their organizations for issues pertaining to records and being a focal point between their organizations and Records Management.
- Complying with the requirements of this Manual and any other supplemental procedures.
- Maintaining control, protection, and accountability of the records in their custody.
- Coordinating the transfer of records.
- Establishing files in accordance with the approved file plan.
- Inspecting records for legibility, reproducibility, and completeness.
- Ensuring records for which they are responsible are sent to the record collection.

3.6 Individual Employees

Individual employees are responsible for:

- Familiarizing themselves with the practice of distinguishing between record and non-record material and their responsibilities under this Manual for the receipt, creation, maintenance, use, and disposition of record material.
- Ensuring all records created or received include the appropriate file number according to the site file plan.
- Ensuring the records in their possession are protected from deterioration, loss, theft, and damage.
- Annually reviewing the Moab Records Management training course.

4.0 Record Creation, Transfer, and Processing

The most fundamental step in developing a comprehensive Records Management Program for any DOE organization and contractor is to identify those records necessary to adequately document the organization's functions, policies, procedures, decisions, and essential transactions. Federal Law 44 USC 3301, "Disposal of Records, Definition of records," determines records/non-record status and subject/topic. The purpose of the record determines retention and preservation requirements in accordance with NARA-approved record disposition schedules.

It is the responsibility of the creator (DOE and contractor) or record recipient to ensure the complete and most legible copy of the document is forwarded to the Records Coordinators in a timely manner for transfer into the Moab Record Collection (MRC).

Constitution of a complete document includes all pages are accounted for, traceability to the activity or item exists (quality record), all appropriate and necessary information is included, and all signatures are included as required by Project procedures and validation/authentication of quality records. Incomplete documents will be returned to the creator for completion. Exceptions will be annotated. Every effort must be made to file/capture the original record. Legibility and reproducibility deteriorate substantially after two or more copy generations.

Generally, only one official record copy is maintained. A record may be maintained for different purposes, in which case there would be two different file codes, each having a different retention and disposition requirement.

4.1 Record and Non-record Identification

4.1.1 Records

Records are defined as information preserved for its administrative, legal, financial, research, scientific, or historical value. Federal law 44 USC 3301 includes all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, other activities of the government, or because of the informational value of data in them.

4.1.2 Non-records

Non-records consist of information maintained for reference and convenience (e.g., duplicate working copies, personal records files) or information for which another organization has primary responsibility. Non-records are stored and disposed of by the organization holding the materials and are retained only for short periods of time (less than 2 years and often not more than 1 year).

Unnecessary delays in disposing of such materials increase the need for on-site storage and add to administrative and overhead costs. Convenience copies should not be kept beyond the “record copy” retention date.

Some examples of non-records are:

- Copies of documents or correspondence, such as reading files and information copies, kept for convenience.
- Follow-up or suspense copies of correspondence.
- Duplicates or extra copies of documents.
- Library materials, catalogs, stocks of publications, and reproduced documents kept for supply and reference.
- Routine printed materials, such as routing slips, work sheets, and transmittal letters that do not add new information to the transmitted material.
- Personal papers consist of documents of a private or unofficial nature that pertain only to an individual’s personal affairs.

4.1.3 Electronic Mail (Email)

TAC Records Management will manage email records to satisfy the Presidential Directive M-12-18, “Managing Government Records Directive,” using the Capstone approach and the General Records Schedule (GRS) 6.1, “Email Managed Under a Capstone Approach.” Some email records, (due to content) may require additional retention beyond the retention period listed in GRS 6.1. These email records will have a second disposition authority.

4.2 Maintaining Legibility and Reproducibility

Records must be clear and legible. Because the final storage media may be digital or microfilm, information must be as reproducible as possible. That is, handwritten material must be fully legible and large enough to remain legible if reduced, and photocopies must be of the best quality attainable.

Colored documents or documents with shaded areas should be avoided as shading and colors do not reproduce well; therefore, all Project forms will be created in a black-and-white format. If a color document is essential, the color of ink must not be the same as the color of the paper.

All records must receive an initial inspection for legibility and reproducibility before any distribution may occur. If records are not legible and reproducible, they must be corrected or re-worked and then re-inspected. This inspection is normally performed by the person preparing the record.

The following guidelines ensure integrity, legibility, and reproducibility are maintained. Correction fluid, tape, or any other method that obscures the original information may not be used.

- Minor corrections are made by drawing a single line through any information to be deleted and initialing and dating the change. Writing must be legible.
- If records are handwritten, and the clarity of the original or copies is questionable, the documents must be translated or revised to produce a consistently legible format.
- Data (including drawings) are recorded with ink that is reproducible, permanent, and preferably black or blue. Lead pencils are discouraged for record copies.
- Whenever possible, records will not contain stamps, barcode labels, or other marks that intersect or obliterate text.
- Records must be administratively and technically complete. Incomplete information within a record reduces its overall value. Meeting minutes without a date, author, or attendees will have little value when trying to establish events or direction during litigation or an audit. The same logic applies to field data or a photograph that cannot be tied to a location or point in time.
- To preserve the integrity of the record collection, corrections to a record in the system will be by addendum to the record.
- The record creator, being the most knowledgeable of the content, should designate applicable record series (file name) or numbers with the assistance of Records Management. The file name or number should be included in the distribution list or placed on the face of the record in the upper or lower right-hand corner. The lower right-hand corner is preferred for records receiving barcode labels.

4.3 Quality Record Authentication

The record creator or receiver is responsible for ensuring the following quality record authenticity requirements are adhered to.

- Authentication is a technical review of the contents of a record to ensure the record is complete and correct according to established requirements. The authentication may be in the form of signatures, initials, or stamps and may appear on construction drawings, quality records, and correspondence that gives direction. Initials and stamps are valid only if a log of corresponding signatures and names is maintained and retrievable for the life of the authenticated records and if the log is reviewed periodically to ensure accuracy.
- Methods of correcting errors must be identified, along with a means of documenting the authorized individual who made the corrections and the date.

4.4 Record Continuity

Organizations that create or receive records must establish controls to ensure legibility, accuracy, completeness, and continuity of their records.

Records Coordinators or file custodians should inspect all records before transferring them to Records for submission to the record collection to ensure:

- The page or sheet sequences are correct.
- All referenced reverse sides of pages are present.
- All referenced attachments, tables, and appendices are present.

- If applicable, the document should have a file number.
- There must be traceability to the activity or item if it is a quality assurance record.
- Records have all required signatures.

4.5 Special Media

4.5.1 Audiovisual/Photographic Material

Audiovisual records include slides, photographs, negatives, audiotapes, videos, and slide and video presentations. Special care must be taken during creation and storage to ensure the media will not deteriorate before the end of the record's lifecycle.

If the records are to be maintained, a compatible processing system must be available for the life of the record. In addition, audiovisual materials, including photographs, images, and videos, must be captioned appropriately, and include detailed descriptions of image/video, names, dates, and location, must be maintained for the images and include an index.

Records Management staff must be consulted before video or photographic media are used to document activities. This action ensures the media have a lifecycle equivalent to the records retention period and is of a format acceptable by NARA if the records will be sent to NARA.

Video and audio recordings – A master and one copy of sound or video recordings, with appropriate labeling, may be accepted as a record. Audiocassettes are not sufficiently durable to be used for long-term or permanent records. Other formats, such as Moving Pictures Experts Group or DVD, may be used with approval from the Records Manager.

Images – During remediation of the Moab site, the Project will create and manage digital images and photographs. Images will be evaluated annually for temporary or permanent retention.

4.5.2 Electronic Records

In preparation for compliance with Presidential Directive M-12-18, which requires all permanent electronic records in federal agencies to be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format by December 31, 2019.

In addition, NARA 2018-2022 Strategic Plan, February 2018 states the following: By December 31, 2022, NARA will, to the fullest extent possible, no longer accept transfers of permanent or temporary record in analog formats and will accept in electronic format and with appropriate metadata.

The Project has implemented an Electronic Records Management System (ERMS) to manage electronic records using Gimmal Compliance Suite software integrated with SharePoint. This combination creates a system compliant with Department of Defense Standard 5015.2, "Design Criteria Standard for Electronic Records Management Software Applications." This is the standard approved by NARA for an ERMS.

Prior to January 1, 2019, Moab records were managed utilizing an in-house created records management system called Department of Energy Records Management System (DOERMS). Paper records in this system will continue to be managed until time and funding permits these records to be scanned, uploaded, and metadata entered in to the SharePoint Records System. The scanning will be performed by a limited number of trained Records Coordinators. Quality checks and validation of the scanned image will be done prior to uploading. Permanent records will be the priority for this task.

Beginning January 1, 2019, all permanent records created or received by the Project, to the fullest extent possible, will be captured in electronic format that meets NARA electronic record requirements.

Beginning January 1, 2019, efforts will be made to capture temporary records in electronic format, with the goal that prior to December 31, 2022, to the fullest extent possible, all temporary records will be in electronic format that meets NARA electronic record requirements.

Electronic records will be uploaded and metadata entered into the SharePoint Records System by a limited number of trained Records Coordinators. Electronic records will meet NARA requirements.

All electronic information systems developed for the Moab Project shall be identified and evaluated for record content and noted as to what, if any, records will be extracted from the system. Electronic records will meet requirements established by Title 36 Code of Federal Regulations Part 1236 (36 CFR 1236), "Electronic Records Management." Electronic files identified as records must meet NARA archival format requirements.

4.6 Special Record Types

4.6.1 Archaeological Records

Archaeological resources are defined as material remains of past human life or activities of archaeological interest that include, but are not limited to pottery, basketry, bottles, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items.

According to federal laws, individuals can and will be held personally liable for advertently or inadvertently disclosing confidential information concerning the nature and location of an archaeological resource, including any federally owned property that is or could be deemed an archaeological resource site. The same federal laws also prohibit the unauthorized disturbance and collection of archaeological and historical materials.

Project managers and the Records Manager are responsible for ensuring the confidentiality of information protected under the Archaeological Resources Protection Act (ARPA), codified at 16 USC 470aa-470mm. This protection generally occurs by restricting access to any ARPA record and by ensuring personnel involved are aware of their responsibilities to safeguard the resources, the records, and the information contained in them.

Project managers and the Records Manager are responsible for the records during their active lifecycle; the Records Manager is primarily responsible for them once they become inactive records. Final disposition usually includes offering them to the appropriate agency.

If records contain information pertaining to the nature and location of archaeological resources, the Records Manager must be notified so these records can be annotated in the appropriate working file index and any special considerations or safeguards taken.

4.6.2 Epidemiologic Records

Epidemiologic and other health-related records are defined as documents that provide information about personnel who have worked at a DOE or contractor site, when they worked at the site, the tasks performed, their exposure to health hazards (e.g., radiation, chemical, metals), and the kind of health problems that they may have experienced during or after employment. In 1990, the Secretary of Energy imposed a destruction moratorium on the destruction of records useful for epidemiologic or health studies. Destruction of epidemiologic records requires special authorization by DOE Headquarters.

4.6.3 Privacy Act Records

The Privacy Act of 1974, codified at 5 USC 552a, protects the security of personal information. Records maintained by DOE contractors containing an item or collection of information bearing an individual's name, identifying number or symbol, or other personal identifying features are Privacy Act records. These records include, but are not limited to, personnel records, training records, security records, medical records, and any other records containing personal information.

Prior to January 1, 2019, hard copy Privacy Act records are maintained in a locked file room with access limited to the responsible organization on a need-to-know basis. They are to be adequately annotated when transferred to inactive storage. While in inactive storage, proper access controls must be implemented by Records Management to ensure the record's confidentiality. All outside inquiries must go through a DOE Privacy Act Officer.

After December 31, 2018, all Privacy Act records will to the greatest extent possible be captured in digital image or native format. Privacy Act records will be held in a limited access SharePoint Records library

Records Management shall ensure Privacy Act records generated that contain personal information that is retrieved by name or other personal identifier are maintained and registered as Privacy Act systems of records.

4.6.4 Official Use Only Records

These records may have potential to damage governmental, commercial, or private interests if disseminated to persons who do not need the information to perform their jobs or other DOE-authorized activities. These records will be managed according to federal records requirements.

4.6.5 Quality Records

The Moab Project Quality Assurance Program requirements are provided in the *Moab UMTRA Project Quality Assurance Plan for the Technical Assistance Contractor* (DOE-EM/GJTAC1525). Associated requirements are established through concurrence with the TAC Project Manager, the assigned Quality Assurance Lead, and the Records Manager.

Any special requirements beyond this Manual should be included in the *Moab UMTRA Project Quality Assurance Plan for the Remedial Action Contractor* (DOE-EM/GJRAC1766). Records classified as quality assurance records must be managed in accordance with the *Quality Assurance Plans* and Title 36 Code of Federal Regulations Part 1220 (36 CFR 1220) “Federal Records,” Chapter 12, “National Archives and Records Administration,” Subchapter B, “Records Management.”

4.6.6 Essential Records Program/Plan

An Essential Records Program outlines how the Project will protect the information needed to conduct business under other than normal operating conditions and to resume business afterward. It also enables officials to identify and protect the most important records dealing with legal and financial rights of the organization and of persons directly affected by the Project’s actions. Working with Project managers, the Records Manager will identify which records within their physical and legal custody are essential to continue operations during a local or national emergency or disaster. The Records Manager will provide essential records training.

Essential records are to be classified as either emergency operating records or legal and financial rights records.

A rule of thumb for identifying and managing essential records is to ask, for each record:

- Can the office’s essential functions continue without that record?
- Can the record be found elsewhere or can the record be reconstructed?
- Is the record already protected elsewhere?

NOTE: Record media shall not affect the determination of whether a record is an essential record. In conjunction with the Records Coordinators, the Records Management staff determines the method and storage location of the essential records collection.

Moab essential records will be duplicated, and copies shall be stored at multiple locations using the following guidelines:

- Copies of emergency operating records may be needed immediately. For example, the emergency telephone tree may be stored in a central location; however, it is important that another copy is stored in the off-site facility with 24-hour access.
- The facility shall have temperature and humidity control and 24-hour security.
- The facility shall have equipment to reproduce records should the need arise.
- The facility shall be available to appropriate personnel at all hours in the case of an emergency.
- Essential record storage areas shall be inspected for water leaks on a monthly basis; leaks may appear on ceiling or floor tiles or along walls or windows.
- The facility shall be professionally treated and inspected for insects and rodents on an annual basis.

The Records Management staff shall create and update an essential records inventory. Updates will be based on essential record creation/revision. Physical essential record inventory will be verified monthly.

The essential records inventory will provide the following information that identifies:

- Hard copy and electronic records.
- Party responsible for the original records, the essential records copies, and for sending copies to storage.
- What the essential records are, their format and volume, and the method used to protect them.
- Where the original records are and the essential record copies maintained.
- How often the essential records are replaced and how they are updated.

4.6.7 Contractor-owned Records

Contractor-owned records created during the performance of the contract shall be maintained in accordance with DOE Acquisition Regulation clause 970.5204.3, “Access to and Ownership of Records,” and the Privacy Act Systems of Records. Contractor-owned records will be identified on the File Plan.

4.7 Records Transfer

Records may be submitted to the Records Manager for processing by hand delivery, inter-office mail, or electronic file for printing, uploading, or scanning. Records may also be submitted utilizing the Records Transfer Transmittal (RTT) Form 1352 (see Attachment 1), available on the Project SharePoint website in the Forms folder. Records received via RTT will be validated, and a copy of the signed transmittal will be returned to the RTT preparer.

4.8 Records Processing

Personnel processing the files must ensure the record copy meets the legibility and reproducibility standards established in Section 4.2, “Maintaining Legibility and Reproducibility,” before processing.

5.0 Active Records Storage and Use

Records must be maintained and used in an effective and efficient manner with proper controls to ensure their protection and preservation. Active quality records located in the Grand Junction UMTRA office are considered to be held in “temporary storage” as defined within Nuclear Quality Assurance (NQA)-1 2004 through 2007 addenda, Requirement 17, Quality Assurance Records. NQA-1 2004 through 2007 Addendum A states: “When temporary storage of records (such as for processing, review, or use) is required, the storage facility or container shall provide a 1-hour fire rating, unless dual storage requirements of paragraph 602.2 are met.”

The construction manager for the office building housing the Grand Junction UMTRA office has confirmed the Grand Junction office area, including the records file room, has a 1-hour or greater fire rating.

Under normal circumstances, paper records pending transfer to Records Management will be stored in fireproof cabinets at satellite file stations. This safe storage practice protects records pending transfer and satisfies the 1-hour fire rated storage required for quality records.

Such storage requires prior approval of the Records Manager and establishing a control and accountability agreement between the responsible manager and Records Management.

Each location's Records Coordinators monitor the records storage areas to ensure the temperature, humidity, and air circulation conditions for the storage area remain within targeted levels. Rapid or extreme changes in temperature and relative humidity can induce an irreversible deterioration process. High temperatures or low relative humidity may cause paper records to become brittle and crack.

High humidity may cause paper records to warp and may promote mold and mildew growth. Images on microfilm may become illegible under extreme environmental changes.

To minimize the risk of damage to or the loss of records, the Records Coordinators ensure Moab Records are stored according to the following criteria:

- Records are not stored closer than 18 inches to water sprinkler heads.
- Records are not stored in contact with electrical or fire alarm systems or where they obstruct any exit, access panel, air conditioning duct, or fire extinguisher.
- Eating, chewing, smoking, and drinking in storage areas are prohibited.
- Roof leaks, signs of moisture, or signs of insects or vermin are immediately reported to the facility maintenance organization.
- Electronic records are stored away from environmental conditions that could accelerate deterioration.
- Records in offices are placed in secured drawers or file cabinets at the end of each workday. Properly securing documents provides additional protection and aids recovery in the event of an after-hours records disaster.

5.1 Records Disaster Prevention, Mitigation, and Recovery

The *Moab UMTRA Project Records Disaster Prevention, Mitigation, and Recovery Plan* (DOE-EM/GJ1524) is designed to assist with records disaster prevention, mitigation, and recovery for each file location of the MRC. This plan provides detailed instructions and resource information applicable to each location and can serve as a stand-alone document in the event of a disaster or emergency situation resulting in potential damage or loss of Moab records. The plan is outlined in the *Records Disaster Prevention, Mitigation, and Recovery Plan*. This is an implementation plan that works in conjunction with the *Moab UMTRA Project Emergency/Incident Response Plan* (DOE-EM-GJ1520) and the *Moab UMTRA Project Continuity of Operations Plan* (DOE-EM/GJ2146).

6.0 File Maintenance

Records must be arranged and maintained in accordance with the DOE Records Disposition Schedules and the Moab file plan. The file codes identified on the file plan may be noted on the record to ensure accurate retrieval during the life of the Project and to consolidate paper records when they are transferred to inactive storage. Non-records must be segregated (with a clearly annotated file folder at minimum) from records.

The record creator, being the most knowledgeable of the content, should designate applicable record series (file name) or numbers. The file name or number should be included in the distribution list, if the list is part of the record, or placed on the face of the paper record in the upper or lower right-hand corner. The lower right-hand corner is preferred for records receiving barcode labels.

To keep paper files manageable and easy to use, the following techniques should be applied:

- Match the document's file name or number with the folder label before placing it in the folder.
- Remove all clips, pins, and rubber bands before filing.
- File material loosely in folders unless fasteners are needed to subdivide papers.
- Check folder thickness. Whenever a folder is not to be subdivided further, and its contents have become 0.75 inch thick, it is time to "break" the file and begin a new folder.
- Keep folder labels visible so that files do not become lost in a drawer.
- As folders become filled with papers, crease the scoring at the bottom of the front folder leaf to allow papers and folders to rest squarely on the bottom of the file drawer.
- Do not fill drawers to capacity. Leave about 4 inches of working space in each file drawer or shelf of records in addition to any space needed for expansion.
- File bulky, oversized material separately in storage equipment suited to its size and place a cross-reference with the related correspondence.
- Ensure parts of another file are not accidentally attached.
- Mend or reinforce all tears with transparent tape.
- Do not file duplicate copies—destroy them.
- Place the file copy of an outgoing reply on top of the related received letter and any other pertinent attachments and staple them together.
- Correspondence, including letters of transmittal and attachments, should be filed by subject in the applicable record-series or file-group file in lieu of in a general correspondence file.

6.1 File Access and Records Retrieval

File access must be controlled from the time a record is filed until its final disposition. When a record is removed from its file location for any reason, that action and the responsible individual should be identified and noted on an "in/out card" or equivalent system such as an ERMS tracking system. Records may not be removed indefinitely. Either a fixed checkout period or a tentative return date must be established by the responsible Records Custodian as part of the tracking process. Under normal circumstances, 30 days is an adequate checkout period. Extensions must receive concurrence from the responsible Records Custodian. Record access for electronic records will be by electronic file.

6.2 File Cutoff

File cutoff – File cutoff is the technique of terminating files at regular intervals or at the completion of a project or activity. This technique provides a system for segregating inactive records from records used daily and simplifies their orderly transfer to inactive storage or disposition.

Records should be cut off according to the file plan. Cutoff periods for all such files should be based on frequency of reference, volume, and retention periods.

For example, because paper records are normally stored in a standard storage box (12 inches by 15 inches), files that accumulate at a rate of one or more boxes each year should be cut off in conjunction with full boxes. If a filing unit accumulates less than one box per year, the system should be adjusted (e.g., 2 years for a full box) to prevent creation of small segments. If the retention period is 1 year or less, the file should be cut off each year.

Electronic records will be cut off utilizing case file folders in SharePoint Records.

6.3 File Plan Maintenance

It is essential that the file plan properly reflect the record series being created by the Moab Project contractor. As new series are established, the appropriate Records Coordinators should refer that new series to the appropriate Records Management staff member for inclusion in the file plan.

7.0 Terminating Employees

When an employee terminates, for whatever reason, the responsible manager or human resources manager shall notify the Records Manager, who will coordinate the records checkout process for the terminating employee.

Records Management personnel should interview the terminating employee. The interview will include a discussion to determine the potential for record material in his or her possession as well as an evaluation of all file drawers and shelves. At a minimum, applicable record tracking systems must be queried for records and other documents checked out to the terminating employee.

In conjunction with the interview or as a result of it, the following activities must occur:

- Personal files must be destroyed.
- Personal papers must be removed or destroyed by the terminating employee when possible.
- Inactive records must be identified and, if possible, inventoried and transferred to inactive storage.
- Non-record material must be identified and destroyed or transferred by the terminating employee to the appropriate custodian when possible.
- Active records must be identified and transferred to the appropriate custodian.
- Email accounts and computers should be reviewed for records.

NOTE: The recipient of record or non-record material identified for transfer must acknowledge its receipt and assume responsibility for the material.

8.0 Inactive Storage

Records are to be arranged and cut off in accordance with the DOE Records Disposition Schedules and the Moab file plan. If records need to be retained longer for business reasons or if records need to be sent to on-site inactive storage prior to the cutoff due to space, contact the Records Manager for approval. Or working through the Records Management Field Officer (RMFO) transfer of records off site to a Federal Records Center (FRC).

9.0 Disposition Plan

The Moab Records Management Program ensures government-owned records in all formats are maintained and protected throughout the lifecycle of the record. Records retention schedules and disposition of records are accomplished in accordance with requirements.

When records are converted from paper to electronic form, metadata and format will meet NARA requirements. Images will be verified for quality and completeness. The paper copy will be retained until verification and approval for destruction.

As remediation of the site progresses, some records will reach the end of their retention period. Federal regulations that govern the destruction of records are codified at 36 CFR 1228, “Disposition of Federal Records.”

A review of the file plan and a physical record inventory of records still cataloged in DOERMS are performed annually to identify temporary records that have met their assigned retention period and need to be processed for disposition.

The SharePoint ERMS is a records system programmed to flag records that have met their assigned retention period. In coordination with the annual file plan review and physical inventory, the disposition program in SharePoint Records will be run to identify records that have met their retention period and will be processed for destruction

When records, regardless of format, are eligible for destruction as delineated in the Project’s approved file plan, they are culled from the collection physically or electronically. The Records Manager fills out the Records Destruction Authorization/Certificate Form 1353 (see Attachment 2) and reviews to:

- Confirm the proper disposition authority was used.
- Validate the record is eligible for destruction based on the cutoff date and retention period.
- Check for any destruction freezes.
- Ensure there is an index of records scheduled for destruction.
- Verify there are no special circumstances or legal holds that may require a record to be retained beyond its scheduled disposition date.
- Request and obtain approvals from custodial department.

- Request and obtain additional approvals (i.e., another assistant director or further technical review).
- Submit form to the DOE RMFO for review and approval and DOE Office of Chief Counsel approval before destruction.
- After receiving required approvals:
 - Hard copy records are shredded.
 - Electronic records are wiped.
 - Appropriate destruction certificates are validated.

In compliance with destruction requirements and regulations, the appropriate steps will be taken to ensure all additional “copies” of records that have met their retention period will be destroyed. This includes all convenience copies held by employees in hard copy, posted to shared drives, and stored on employee computers.

Destruction Risks

Delayed destruction – Temporary records must be destroyed promptly on or shortly after the approved destruction date. If destruction is not prompt, the agency/organization will be obligated to review and include those records in response to a discovery or Freedom of Information Act (5 USC 522) request.

Improper destruction method or incomplete destruction – DOE must ensure temporary records, especially classified, official use only, unclassified controlled nuclear information, and other sensitive records are destroyed in accordance with the applicable regulations. If destruction is not done properly, information in records may be compromised or stolen. Offices must make certain any paper records and other media are completely destroyed and that electronic records are destroyed in such a manner that the record cannot be physically reconstructed.

Temporary Records Transfer to Inactive Storage

On Site

Records are to be arranged and cut off in accordance with the DOE Records Disposition Schedules and the Moab file plan. If records need to be retained longer for business reasons or if records need to be sent to on-site inactive storage prior to the cutoff due to space, contact the Records Manager for approval.

Off Site

Records should be retained at the on-site inactive storage location for a period that is consistent with disposition authority and efficient operations. Records Management will work through the RMFO to request transfer of temporary records to an FRC.

FRC

The FRC serves as a Records Center for storing temporary records for federal agencies. These records are still in the custody of the federal agency, and records maintenance, access, retrieval, storage costs, and activity charges remain the responsibility of the transferring agency.

Permanent Records Transferred to NARA

Presidential Directive M-12-18 requires all permanent electronic records in federal agencies to be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format by December 31, 2019. Records Management will work through the appropriate RMFO to request transfer of permanent records to NARA.

10.0 Training

Personnel receiving, creating, using, or maintaining records should be cognizant of the applicable areas within this Manual. The Records Manager will provide training on how to identify and transfer record materials. Personnel involved in maintaining records will receive proper training to preserve consistency and continuity. Record Management training is a new hire requirement as well as an annual review.

11.0 Records Created by this Manual

DOERMS is an active paper records management system. Portions requiring retention after the life of the file will be printed out and the hard copy will be the record copy. Other records created in conjunction with this Manual are maintained by and the responsibility of the individual organizations or projects.

The following known records are created through implementation of this Manual.

- File Plan
- Records Transfer Transmittal Form 1352
- Destruction/Authorization Notices Form 1353
- Essential Records Inventory

12.0 Definitions

Active records – Active records are those records necessary to conduct the current business of the RAC and TAC office or organization and, therefore, generally maintained and readily accessible by those groups.

Adequate and proper documentation – Adequate and proper documentation is a record of the conduct of U.S. Government business that is complete and accurate to the extent required to document the organization, functions, policies, decisions, procedures, and essential transactions of the agency. It is designed to furnish the information necessary to protect the legal and financial rights of the federal government and of individuals directly affected by the agency's/organization's activities.

Case files – Case files are records that are closely related and that support each other, such as all records pertaining to a specific subcontract or instrument. Case files are identified as a package and are managed and treated as an entity.

Correspondence – Correspondence includes memorandums, letters, telecommunications, and any other form of addressed, written communications (e.g., email, faxes, teleconference records) that are sent or received in the conduct of the contractor’s business.

Disposition – The actions taken regarding records and non-record materials no longer needed for current government business. These actions include transfer to agency storage facilities or FRCs, transfer from one federal agency to another, transfer of permanent records to NARA, and disposal of temporary records and non-record materials when no longer needed or retention is met.

Destruction – Eliminate a group of records from a system in compliance with the appropriate records retention schedule so that they cannot be accessed, retrieved, or recovered.

Document – Recorded information regardless of physical form or characteristics. “Document” is often used interchangeably with “record.”

File – A file is an accumulation of documents maintained in a pre-determined physical arrangement. “File” can also mean to place documents in a pre-determined location according to an overall plan of classification.

File plan – A comprehensive outline specific to an organization or function that defines its records series, file organization, records custodians, active file locations, file transfer instructions, file retention and disposition instructions, and other organization-specific instructions that provide guidance for effective management of its records.

File series – A file series is an identifiable portion (or segment) of an organized file that can be described, handled, used, or disposed of as a whole; it is a complete file or part of a file that requires a separate description because of variations in arrangements or subject content, retirement or disposal characteristics, significant volume, or unique physical form (e.g., maps, drawings, oversized files).

File station – A file station is any location in an organization at which records are maintained for active use. File stations can be established within functional or project organizations. Requirements for proper protection, storage, and accessibility of records must be in place and enforced at each file station. If these requirements cannot be satisfied, the records must be transferred to inactive storage.

Inactive documents – Inactive documents are records and non-records that are no longer needed by offices or organizations to conduct their business. Inactive records should be transferred to inactive storage until their approved retention has been met. Inactive non-records must be maintained separately from records and are the responsibility of the individual employee who has custody of the non-records and should be destroyed when no longer needed or retention of record is met.

Legibility – Legibility is a characteristic of a document that enables the content to be easily read and reproduced. The text or lettering must be clear enough to be read or deciphered, and handwriting must have distinct letters that are recognizable.

Lifecycle of records – The lifecycle of a record is the management concept that records evolve through three distinct stages: (1) creation, (2) maintenance and use, and (3) disposition.

NARA – NARA is responsible for overseeing agencies’ adequacy of documentation and records disposition programs and practices, and the General Services Administration (GSA) is responsible for overseeing economy and efficiency in records management. The Archivist of the United States and the Administrator of GSA issue regulations and provide guidance and assistance to federal agencies on records management programs. NARA regulations are in this subchapter.

GSA regulations are in 41 CFR 102-193, “Creation, Maintenance, and Use of Records.” NARA establishes standards for the retention of records having continuing value (permanent records), and assists federal agencies with applying the standards to records in their custody.

Non-records – Non-records are government-owned documentary materials that do not meet the legal definition of federal records. Non-records consist of library or reference materials and working papers, such as drafts, informal notes, convenience copies of documents, and papers created or accumulated in the process of producing records.

NQA-1-2004 and addenda through 2007 – American Society of Mechanical Engineers (ASME)/NQA-1-2004, “Quality Assurance Program for Nuclear Facilities,” 2004 and addenda through 2007.

Permanent records – Permanent records have continuing value and are considered so valuable or unique in documenting the history of the agency or for informational content that they should be preserved forever as part of the National Archives of the United States.

Personal papers – Personal papers are documentary materials belonging to an individual that are not used to conduct official government business, are related solely to an individual’s own affairs, or are used exclusively for that individual’s convenience.

Quality Assurance – A completed document that furnishes evidence of the quality of items and/or activities affecting quality. Records may also include specially processed documents such as radiographs, photographs, negatives, or microforms (see ASME NQA-1 2008). Quality Assurance records must be reviewed to determine if they are classified as Lifetime records.

Lifetime records – Lifetime records require maintenance for the life of the particular item while it is installed in the plant or stored for future use; therefore, lifetime records are those associated with “items.”

NOTE: Under NARA, “Lifetime” is NOT the same as “Permanent” and shall not be confused with retention period.

Nonpermanent records – Nonpermanent records are those required to show evidence that an activity was performed in accordance with applicable requirements, but does not need to be retained for the life of the item; therefore, nonpermanent records are those associated with “activities.”

Record – A federal record is defined in 36 CFR 1220 as all books, papers, maps, photographs, machine-readable materials, or other documentary information, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under federal law or in connection with the transaction of public business. Records require preservation by the agency and its contractors as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the federal government.

Records management – Records management is planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the lifecycle of records to achieve adequate and proper documentation of federal policies and transactions and the effective and economical management of DOE operations. Records Management is also referred to as records administration.

Records schedule – A records schedule is a NARA-approved document providing categories and appropriate disposition instructions of federal records. The records schedule is the legal authority to retain and dispose of federal records. A records schedule may also be referred to as a records disposition schedule, a records control schedule, or a records retention schedule.

Record series – A record series consists of file units or documents arranged according to a filing system or kept together because they relate to a particular subject or function, result from the same activity, document a specific transaction, or have some other relationship arising out of their creation, receipt, or use.

Temporary records – Temporary records are those records approved by NARA for disposal, either immediately or after a specified retention period.

13.0 References

36 CFR 1220 (Code of Federal Regulations), “Federal Records,” Chapter 12, “National Archives and Records Administration,” Subchapter B, “Records Management.”

36 CFR 1228 (Code of Federal Regulations), “Disposition of Federal Records.”

36 CFR 1236 (Code of Federal Regulations), “Electronic Records Management.”

41 CFR 102-193 (Code of Federal Regulations), “Creation, Maintenance, and Use of Records.”

5 USC 552 (United States Code), Freedom of Information Act.

5 USC 552a (United States Code), Privacy Act of 1974.

16 USC 470aa-470mm (United States Code), Archaeological Resources Protection Act.

44 USC 31 (United States Code), Federal Records Act of 1950.

44 USC 3301 (United States Code), “Disposition of Records, Definition of records.”

ASME/NQA-1-2004 (American Society of Mechanical Engineers/National Quality Assurance), “Quality Assurance Program for Nuclear Facilities,” 2004 and addenda through 2007.

DEAR 970.5204.3 (Department of Energy Acquisition Regulation), “Access to and Ownership of Records.”

DOD 5015.2 (Department of Defense) Standard 5015.2, “Design Criteria Standard for Electronic Records Management Software Applications.”

DOE (U.S. Department of Energy), *Moab UMTRA Project Continuity of Operations Plan* (DOE-EM/GJ2146).

DOE (U.S. Department of Energy), *Moab UMTRA Project Emergency/Incident Response Plan* (DOE-EM/GJ1520).

DOE (U.S. Department of Energy), *Moab UMTRA Project Quality Assurance Plan for the Remedial Action Contractor* (DOE-EM/GJRAC1766).

DOE (U.S. Department of Energy), *Moab UMTRA Project Quality Assurance Plan for the Technical Assistance Contractor* (DOE-EM/GJTAC1525).

DOE (U.S. Department of Energy), *Moab UMTRA Project Records Disaster Prevention, Mitigation, and Recovery Plan* (DOE-EM/GJ1524).

GRS (General Record Schedule) 6.1, “Email Managed Under a Capstone Approach.”

Presidential Directive M-12-18, “Managing Government Records Directive.”

Attachment 1.
Records Transfer Transmittal Form 1352

Attachment 1. Records Transfer Transmittal Form 1352

Records Transfer Transmittal

Date Prepared	Prepared by	Phone Number	Moab Satellite Station	Moab Central File Station	
Company Name		Organization	Page ____ of ____		

Date/Inclusive Dates	Record Title/Description	Estimated Volume	Suggested File Code	Special Instruction/Information or Barcode	Verify/Comment
Transfer Preparer Signature		Date	Transfer Receiver Signature		Date

SAMPLE

Attachment 1. Records Transfer Transmittal Form 1352 (*continued*)

Instructions for Records Transfer Transmittal (RTT)

(please print of type)

To be completed by the Records Transfer Preparer:

1. **Date Prepared/Prepared by/Phone Number/Company Name/Organization:** Enter the date prepared, your name and phone number, company name and organization.
2. **File Station:** Check the appropriate transfer location.
3. **Page __ of __:** Consecutively number each transmittal page that is required to describe the records being transmitted, and note the total number of pages in the transmittal.
4. **Date/Inclusive Dates:** Enter the record date or the inclusive date range if submitted as a case file.
5. **Record Title/Description:** Enter the record title or record description.
6. **Estimated Volume:** Enter the estimated volume as binders, folders, cubic feet (cu ft), or fractions of cu ft, e.g., 1 inch = 1/15 of a cu ft. Less than 1 inch would be < 1/15 cu ft.
7. **Suggested File Code:** Enter the file code suggested by the submitting organization.
8. **Special Instruction/ Information or barcode:** Enter any special instructions or additional information or barcode.
9. **Signature/Date:** Sign and date the RTT (if signature is illegible, please print name in parentheses). Create a copy of the RTT to be held in a suspense file. Forward the original RTT with the records to the appropriate file station. Maintain your copy until confirmation is returned.

To be completed by the Records Transfer Receiver:

10. **Verify/Comment:** The receiver will conduct a quality review of the records transferred and any information in the form. Check mark in the Verify/Comment box designates passage of the review and information in the transfer. Verify/Comment will also identify a problem with the record or the form entry. If a problem is identified the receiver will contact the preparer to try to resolve the problem. If the problem cannot be resolved through a phone call or e-mail that portion of the transfer, with the annotated transmittal, will be returned to the preparer for correction and resubmission.
11. **Signature/Date:** Receiver will sign, date and return signed copy of the RTT to the preparer.

Attachment 2.
Records Destruction Authorization/Certificate Form 1353

Attachment 2. Records Destruction Authorization/Certificate Form 1353

Attachment 2. Records Destruction Authorization/Certificate Form 1353 (continued)

**U.S. Department of Energy
Moab UMTRA Project
RECORDS DESTRUCTION AUTHORIZATION/CERTIFICATE**
Please complete a separate form for each records series eligible for destruction

The records identified below have reached their retention period and are eligible for destruction. Your signature certifies that these records no longer possess sufficient administrative, legal, historical, or fiscal value to warrant further retention and can be destroyed. If the records can not be destroyed due to special circumstances (e.g., litigation, claims, DOE destruction moratoria), and a temporary extension of the retention period is required, please provide the reason for the temporary extension of the retention period to include a future review date (up to one year is permitted) in the space provided below. *Authority: 36 CFR §1228.54 and §1228.58.*

DISPOSITION AUTHORITY <small>Applicable DOE Records Schedule and Item number.</small>		RECORDS SCHEDULE TITLE	
SERIES DISPOSITION TITLE			
SERIES DESCRIPTION <small>Enter the applicable DOE Records Schedule Series Description</small>			
SAMPLE			
RETENTION PERIOD <small>Disposition instructions as shown in the applicable DOE Records Schedule disposition authority</small>			
CUSTODIAL DEPARTMENT		DEPARTMENT SIGNOFF	
		NAME:	
		TITLE:	
		SIGNATURE:	
ACCESSION NUMBER FROM NARA STANDARD FORM SF-135 <small>(if stored at a Federal Records Center)</small>		TOTAL VOLUME	
		<i>Paper</i>	<i>Efiles</i>

Attachment 2. Records Destruction Authorization/Certificate Form 1353 (*continued*)

Attachment 2. Records Destruction Authorization/Certificate Form 1353 (continued)

BOX # or FILE CODE	DESCRIPTION OF BOXES TO BE DESTROYED <small>Enter a description of the type and information content of the records included in the series</small>	INCLUSIVE DATES <small>Enter the period covered by the records</small>		ELIGIBLE FOR DESTRUCTION DATE Month/Year
		From	To	

<input type="checkbox"/>	Approved	Moab Records Manager	Date
<input type="checkbox"/>	Approved	DOE Records Management Officer	Date
<input type="checkbox"/>	Approved	DOE Office of Chief Counsel	Date

SAMPLE

Reason for temporary extension of the retention period.

Destruction Certification
<i>I hereby certify the above records have been destroyed:</i>
Number
Method of destruction
Date records destroyed:
Signature:
<u>Electronic</u>
Method of destruction:
Date records destroyed:
Signature: